

## **EXHIBIT “A”**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SUNIL KUMAR, Ph.D.,  
PRAVEEN SINHA, Ph.D.,

Plaintiffs,

vs.

No. 2:22-CV-07550-

RGK-MAA

DR. JOLENE KOESTER, in her  
official capacity as  
Chancellor of California State  
University,

Defendants.

/

Zoom Videoconference

Deposition of

LAURA ANSON

Friday, August 4, 2023

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Reported By: STACY L. LOZANO, CSR No. 12831

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1           We also sought stakeholder feedback from a number  
2       of different organizations, and reviewed that feedback and  
3       incorporated some of that feedback into our policy.

4           Q. What is a stakeholder as you've just used that  
5       term?

6           A. A stakeholder would be members of the CSU  
7       community who would be, you know, governed by this policy.

8           Q. Okay. And can you just sort of tell me who  
9       members of the CSU community governed by this policy would  
10      be?

11          A. Well, the stakeholders we consulted were probably  
12      20 different groups. So it was campus Title 9  
13      coordinators, campus DHR coordinators, University police  
14      departments, student -- vice presidents of student  
15      conduct, PROVOS presidents. The campus ADPs of HR.  
16      Campus ADPs of faculty affairs. The ASSA, it's a student  
17      organization. And all of our labor unions.

18          Q. You said ASSA. Did you mean CSSA?

19          A. Yeah, sorry CSSA. Cal State Student Association.

20          Q. No worries.

21          A. There're probably other ones. Those are the ones  
22      that I can remember, kind of, off the top of my head.

23          Q. And how is it determined which stakeholders to  
24      seek input from?

25          A. Those are pretty much all of our stakeholders.

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1           A. Well, it's my understanding that castes have a  
2 few different subgroups. Like, for instance, you have the  
3 Dalit class or the Brahmin class, and they are, you know,  
4 some are considered higher or lower than each other. And,  
5 you know, Dalit I guess is considered a lower ranked caste  
6 or designation than Brahmin.

7           Q. And how is caste a subset of race?

8           A. Well so, you know, race would refer to any of the  
9 groups that people are often divided into based on  
10 physical traits that are regarded as common among people  
11 of shared ancestry. So immutable qualities.

12           So caste is considered also to be immutable, and  
13 that's why we consider it related to race or ethnicity.

14           Q. Well, where did you come up with the belief that  
15 caste is an immutable characteristic? Where can I find  
16 that? I mean, obviously, it's your testimony, but where  
17 can I find that?

18           A. I think that's just based on general reading  
19 about caste being an inherited status. Like something you  
20 are born into, born with.

21           Q. And that can't be changed, is that your position?

22           A. Yes.

23           Q. Okay. And how is caste a subset of ethnicity?

24           A. Well, so, generally speaking, ethnicity is maybe  
25 a little broader than race. It refers to large groups of

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1 to the non-discrimination policy?

2 A. Based on discussions in the workgroup. But, you  
3 know, primarily we were hearing from our student body, our  
4 faculty, and members of the campus communities that they  
5 believe that they were being subjected to caste  
6 discrimination, and that it was negatively impacting their  
7 educational environment, their workplace environment.

8 They were very vocal about this, and we listened  
9 to all of the concerns that they expressed. We took those  
10 seriously, and we decided to incorporate caste into the  
11 policy as a -- as a subcategory of race and ethnicity,  
12 based on just what we were hearing from these people in  
13 our community.

14 Q. Other than those, I'll call them -- I don't want  
15 to belittle it, so anecdotal sort of information; is that  
16 sort of fair to say? You were hearing from stakeholders  
17 of alleged caste discrimination; is that...

18 A. Yes. Yes. We were hearing people tell us very  
19 loudly, very vocally, that they viewed this caste  
20 discrimination as a real thing. And, you know, we want  
21 our students to have a positive educational experience.  
22 We want our faculty to have a positive employment  
23 experience.

24 And based on the concerns that they were  
25 expressing to us, which we listened to very carefully, we

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1 A. Well, I think that's a matter of opinion.

2 Q. I'm asking you if Q1 answers the question.

3 A. I don't think it directly answers the question.

4 But it gets at the answer, which is it was -- that caste  
5 was included, based on the feedback that we were hearing  
6 from, you know, our students, our faculty, other groups  
7 that, you know, that they're experiencing this, and that  
8 -- that we wanted to do something about it so we included  
9 it as a parenthetical reference under race and ethnicity.

10 Q. If I want to know what caste means, does A1  
11 answer that for me?

12 MR. MICHALOWSKI: Argumentative.

13 You can answer.

14 THE WITNESS: I guess it doesn't directly answer  
15 it.

16 BY MR. TWERSKY:

17 Q. Does it indirectly answer it?

18 A. I think it indirectly answers it.

19 Q. How so?

20 A. Well, it's just talking about our commitment to  
21 inclusivity and respect, and making our campuses, you  
22 know, places of access for opportunity and equity. Okay.

23 Caste systems treat people unequally, so we're  
24 trying to do something about it.

25 Q. When the stakeholders mentioned that they wanted

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1 to include caste in the non-discrimination policy, what  
2 caste systems would they refer to the workgroup?

3 MR. MICHALOWSKI: Foundation and compound.

4 You can answer.

5 THE WITNESS: I don't understand the question.

6 BY MR. TWERSKY:

7 Q. Sure. You told me earlier that stakeholders  
8 provided feedback that led the workgroup to include caste  
9 in the revisions to the policy; is that correct?

10 A. Yes.

11 Q. Okay. What caste systems were identified by  
12 stakeholders?

13 A. You know, I don't know actually. I was -- we  
14 were informed that just these stakeholders were saying  
15 that they were -- they felt that they had been subjected  
16 to discrimination or, you know, being treated materially  
17 differently based on their caste than others.

18 So I don't know if they -- I don't know actually  
19 whether or not they identified any particular, you know,  
20 caste, or -- I don't know, or caste system.

21 Q. Who would know?

22 A. Well, I suppose the stakeholder groups themselves  
23 would know.

24 Q. Well, the stakeholder groups brought this to the  
25 work group, correct?

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1           A. No. I would say the stakeholder groups didn't  
2 speak with the work group directly. The stakeholder  
3 groups were, I believe, communicating with senior CSU  
4 including the Chancellor and other senior leaders. And  
5 then those comments were, you know, passed along to the  
6 workgroup. They -- these groups did not speak with us  
7 directly.

8           Q. So from whom did the workgroup get information  
9 about caste discrimination at CSU campuses?

10          A. Well, I heard about it from, you know, from Tammy  
11 Kenber, who is on the workgroup herself, and who was the  
12 associate Vice Chancellor.

13          I believe she was hearing it from the Vice  
14 Chancellor, and -- who was probably also hearing it from  
15 the Chancellor. So just, you know, I -- I think these --  
16 these perspectives of these groups were being directed at  
17 the Chancellor himself in large part.

18          Q. Who was the Vice Chancellor you referred to a  
19 moment ago?

20          A. At this time it was Evelyn Nazario.

21          Q. Is Evelyn Nazario still at CSU?

22          A. No, she's retired.

23          Q. She's --

24          MR. MICHALOWSKI: Michael, we're at the one-hour  
25 mark. I'm fine continuing, unless Ms. Anson, do you need

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1           Q. Was the information contained in this letter and  
2       the accompanying resolution part of what was provided, at  
3       least anecdotally, to the workgroup?

4           A. I would say, generally speaking. I mean, we were  
5       told there was a resolution.

6           Q. Okay. Were you told what the resolution was?

7           A. I think only in general terms. I don't remember  
8       any specifics about -- I don't remember being told any  
9       specifics about the resolution.

10          Q. Okay. The middle paragraph of the letter on CSU  
11       1217 states, "Caste is a structure of oppression in Hindu  
12       society that assigns social status based on -- based on  
13       one's spiritual purity."

14          Do you see that?

15          A. I do, yes.

16          Q. Okay. That's different than the definition of  
17       caste you provided, isn't it?

18          A. Yes.

19          Q. Hindu is a religion, isn't it?

20          A. I believe so.

21          Q. Okay. The letter encloses a resolution by the  
22       Cal Poly ASI Board of Directors requesting to include  
23       caste in the non-discrimination policy, correct?

24          A. Yes.

25          Q. Okay. On page 1218 is the resolution. I'm going

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1 to direct your attention to the third whereas clause.

2 A. Okay. Let me find it.

3 Q. Just tell me when you're there.

4 A. Okay, I'm there.

5 Q. Okay. This resolution states, "There are four  
6 main caste groups," and then there is a group outside the  
7 caste system referred to as Dalits.

8 Do you see that?

9 A. Yes. Uh-huh.

10 Q. Are you aware that those are the historic castes  
11 found in India and South Asia?

12 A. I'm generally aware of that, yes.

13 Q. Are you aware of those castes found anywhere  
14 else?

15 A. No, but I am aware that there are caste systems  
16 in other countries outside of India. Caste systems are  
17 not exclusive to India. They're found in other countries  
18 like Pakistan, Sri Lanka, Nepal, Japan.

19 Q. Does this resolution on 1218 and 1219 reference  
20 any of those other caste systems you just referred to?

21 A. I don't believe so.

22 Q. It just refers to the one associated with India  
23 and South Asia?

24 A. It looks like it.

25 Q. Is caste a structure of oppression in Hindu